



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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April 17, 1996

Ms. Sheri Bianchin  
Remedial Project Manager, HSRL-6J  
United States Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604



Dear Ms. Bianchin:

RE: First Draft, Perimeter Groundwater  
Containment System- 50% Design Submittal,  
American Chemical Services NPL Site, Griffith,  
Lake County, Indiana.

Staff of the Indiana Department of Environmental Management, Office of Environmental Response have reviewed the First Draft of the Perimeter Groundwater Containment System- 50% Design submittal for the American Chemical Services Inc. NPL Site located in the town of Griffith, Lake County, Indiana. The following comments have been reviewed through a technical review of the document.

## General Comments

- [1] Be advised that although IDEM reviewed the 50% design submittal for the Perimeter Groundwater Containment System, a thorough engineering review was not conducted, as engineering staff are not available in the Office of Environmental Response.
- [2] This document does not address sampling and analysis criteria for this phase of the project. As discussed in a previous meeting, addenda to the Draft Quality Assurance Project Plan and Pre-Design Activities Quality Assurance Project Plan would be submitted for each phase of work to be conducted. These addenda were not included in this document.

## Specific Comments

- [3] Section 1.2.3, page 1-4, paragraph 1; O&M Plan, Section 1.1.3, page 1-3, paragraph 3. The document states that "observations made during test pit excavations in 1993 did not

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detect any intact drums.” This sentence appears misleading as there may, in fact, still be intact drums within the area. Please revise or delete this sentence.

- [4] Section 2.1.1, page 2-1, bullet 3. The last bullet states “...after the barrier wall is installed; and”, however, nothing follows the “and”. Please correct.
- [5] Section 2.1.2, page 2-3, paragraph 2. Please provide further clarification on how the contaminated water will be gradually bled into the treatment system influent. What criterion will be used to determine if the process of gradually adding the water to the treatment system influent is feasible. In addition, please discuss how the water from the Still Bottoms Pond (SBP) and Off-Site Containment Area (OFCA) will be transported to the treatment facility.
- [6] Section 2.1.4, pages 2-6 and 2-12, bullets 1, 2, and 3. The document highlights several uncertainties about whether or not the water quality data for the SBP and OFCA are truly representative of the material that will actually be extracted by the Dewatering systems. It is important to note that other factors may impact sampling results including, but not limited to a bias from the settling of materials from contaminated water sealed in the 55-gallon drums, the volatilization of constituents into the headspace of the drum, bias from the selection of sample locations, 50:50 sample mixtures, averaging of samples, and the 24 hour settling time. While it is recognized that multiple factors will influence the system design, additional clarification is needed for the rationale utilized to determine these factors.
- [7] Section 2.7.0.5, page 2-50, paragraph 1. Please determine if a sprinkler is required by local codes and state the findings in this section.
- [8] Section 4.1, page 4-1, paragraph 1. The cost estimates provided do not consider the sludge generated a hazardous waste.
- [9] Section 5.1.8, page 5-7, paragraph 1. The document states “ A flow paced effluent sampler will collect composite samples from the stilling chamber via an effluent sample line”. Further definition and clarification is needed regarding the stilling chamber and composite samples.
- [10] Section 6.6.2.1, page 6-13, paragraph 1. The second sentence should be revised as follows: “The pre-final inspection will be attended by a representative of the ACS Technical Committee, the Construction Manager, the Construction Superintendent, a representative from the USEPA, and a representative from IDEM.”
- [11] Section 6.6.2.2, page 6-13, paragraph 1. The second sentence should be revised as

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follows: "The final inspection will be attended by a representative of the ACS Technical Committee, the Construction Manager, the Construction Superintendent, a representative from the USEPA, and a representative from IDEM."

- [12] Section 6.6.3, page 6-14, paragraph 1. The first sentence should be revised as follows: "Following the final inspection, a Construction Completion Report will be prepared by the CQA Manager and a registered professional engineer and will be submitted to the ACS Steering Committee for submittal to USEPA and IDEM."
- [13] PGCS O&M Plan, Section 1.4.2, page 1-20, paragraph 1. Under the Process Air Emissions Criteria, please state air emissions limits and the methods which will be used to monitor compliance with said limits.
- [14] PGCS O&M Plan, Section 11.4, page 11-2, paragraph 1. Please state the local guidelines for emissions monitoring. Also, include which type of portable field equipment will be utilized and the frequency of monitoring.
- [15] PGCS O&M Plan, Section 11.5.2, page 11-3, paragraph 1. Please discuss personnel and equipment decontamination instead of simply citing 29 CFR 1910.120.
- [16] PGCS O&M Plan. The plan discusses Appendix I and Appendix II, however, these appendices are not provided. Please include.
- [17] Section 8.2.1, page 8-2, paragraph 1. This states that water level measurements will be obtained from select piezometers and monitoring wells, to generate groundwater contour maps and evaluate the trench capture zone. In addition to existing monitoring locations, twelve new piezometers (four clusters of three piezometers) will be installed along the trench. The document does not provide a map illustrating the location of the trench and monitoring points. This needs to be provided in the report.
- [18] Table 8-1. This references a sediment sample to be collected annually. The purpose and location of this sample need further clarification.
- [19] Section 8.4.3, Section 8.4.4, Section 8.4.5. When referencing the Quality Assurance Project Plan as indicated in each of these sections of the document, it does not appear that the information which would pertain to this particular activity is included. If the information is in the QAPP, please indicate the section (s) and page (s) for ease of reference. If the information is not in the QAPP, please provide an addendum to the QAPP which would include the appropriate information.
- [20] Section 8. The document states that Attachments A and B will be included with the

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100% design. The cover letter included with this document states "Although the document is entitled the 50 percent design submittal, it reflects the 100 percent design level. The only modifications planned for the 100 percent design submittal include those required to address agency comments and the impacts of the recent data collected as part of the groundwater investigation and the barrier wall alignment program." Therefore, these attachments should have been included within this submittal. Please provide Attachments A and B.

Staff would appreciate receiving a copy of the comments provided to the Respondents by the United States Environmental Protection Agency. If you have any questions or concerns, please feel free to contact me directly at 317/308-3116.

Sincerely,



Holly Grejda, Project Manager  
Superfund Section  
Office of Environmental Response

cc: K. Grindstaff, IDEM  
F. Metcalfe, IDEM